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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,)	
)	No. CR 12-00616-YGR
Plaintiff,)	
)	STIPULATION TO CONTINUE; ORDER
12 vs.)	CONTINUING CASE AND EXCLUDING
)	TIME UNDER THE SPEEDY TRIAL ACT
13 TONYA GILARD, ET AL .,)	
)	
14 Defendant.)	
15 _____)	

16 IT IS HEREBY STIPULATED, by and between the parties to this action, that the
17 STATUS HEARING date of November 8, 2012 presently scheduled at 2:00 p.m., before the
18 Honorable Yvonne Gonzales Rogers, be vacated and re-set for **December 20, 2012** at 2:00 p.m.
19 for TRIAL OR MOTIONS SETTING OR DISPOSITION HEARING.
20

21 The reason for this request is that all defense counsel are continuing to review, organize,
22 and investigate voluminous discovery in this case. Presently there are approximately 2600 pages
23 of discovery including financial records and tax documents. Search warrant affidavits are
24 forthcoming.

25 The parties agree and stipulate that the time until **December 20, 2012** should be
26 excluded, under 18 U.S.C. §3161(H)(7)(A) and (B)(iv), because the ends of justice served by the

1 granting of the continuance outweigh the best interests of the public and the defendant in a
2 speedy and public trial. The continuance is necessary to accommodate counsel's preparation
3 efforts.

4
5 Date 11/06/12 /s/
6 John Paul Reichmuth
7 Assistant Federal Public Defender
8 Counsel for defendant GILARD

9 Date 11/06/12 /s/
10 Rees Morgan
11 Counsel for defendant HARVEY

12 Date 11/06/12 /s/
13 Doron Weinberg
14 Counsel for defendant CRUMMIE

15 Date 11/06/12 /s/
16 Thomas Newman
17 Assistant United States Attorney

ORDER

The court finds that the ends of justice served by the granting of the continuance outweigh the best interests of the public and the defendant in a speedy and public trial. The continuance is necessary to accommodate counsel's preparation efforts including the review, organization, and investigation of over 2600 pages of discovery. Based on these findings, IT IS HEREBY ORDERED THAT the above-captioned matter be continued to **December 20, 2012** at 2:00 p.m., and that time be excluded from the date of this order to **December 20, 2012** pursuant to 18 U.S.C. §§3161(h)(7)(A) and (B)(iv).

IT IS SO ORDERED.

November 7, 2012
Date



HON. YVONNE GONZALEZ ROGERS
UNITED STATES DISTRICT JUDGE